

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
This Document Relates to the) Master Docket Case No. 1:11-cv-05468
Below Listed Cases)
) Honorable Rebecca Pallmeyer

Frances Beaman v. Zimmer, Inc., et al., 1:11-cv-07547
Cheryl Gustafson, et al. v. Zimmer, Inc., et al., 1:11-cv-05746
David R. Langevin v. Zimmer, Inc., et al., 1:11-cv-05476
Elsie Alice Buehler v. Zimmer, Inc., et al., 1:11-cv-05749
Anita McCants, et al. v. Zimmer, Inc., et al., 1:11-cv-05757
Patricia Monroe v. Zimmer, Inc., et al., 1:11-cv-05734
James Krammes, et al. v. Zimmer, Inc., et al., 1:11-cv-05488
Robert Carr v. Zimmer, Inc., et al., 1:11-cv-00974
Beverly Goldberg v. Zimmer Holdings, Inc., et al., 1:11-cv-06425
Margaret Loveday, et al. v. Zimmer, Inc., et al., 1:11-cv-05752
Victoria Messina, et al. v. Zimmer, Inc., et al., 1:11-cv-06423
William A. Quade v. Zimmer, Inc., et al., 1:11-cv-07272
Donald C. Waterman v. Zimmer, Inc., et al., 1:11-cv-06097
Corda B. Gaddy v. Zimmer, Inc., et al., 1:12-cv-00089

ZIMMER ENTITIES' MOTION FOR SUGGESTION OF REMAND

The defendants, Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc. (collectively "the Zimmer Entities"), respectfully

request that the Court file a suggestion of remand with the Judicial Panel On Multidistrict Litigation for the above-listed cases.

The grounds for this motion are set forth in the supporting brief, filed contemporaneously.

WHEREFORE, the Zimmer Entities respectfully move the Court to file a suggestion of remand with the Judicial Panel On Multidistrict Litigation for the above-listed cases.

BAKER & DANIELS LLP

/s/ Andrea Roberts Pierson

Joseph H. Yeager, Jr. (Ind. State Bar #2083-49)
Andrea Roberts Pierson (Ind. State Bar #18435-49-A)
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
Telephone: (317) 237-0300
Fax: (317) 237-1000
Email: jay.yeager@bakerd.com
andrea.pierson@bakerd.com

Attorneys for Defendants Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/ Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc.

CERTIFICATE OF SERVICE

I certify that on February 10, 2012, a copy of the foregoing Zimmer Entities' Motion For Suggestion Of Remand was filed electronically. Parties may access this filing through the Court's system. I further certify that on February 10, 2012, a copy of the foregoing Zimmer Entities' Motion For Suggestion Of Remand was sent by first-class United States mail, postage prepaid, upon the following:

Gregory T. Mueller
Frank & Mueller, LLC
308 North 21st Street, Suite 401
St. Louis, MO 63103

Shannon Lukei
Robinson, Calcagnie, Robinson, Shapiro & Davis
620 Newport Center Drive Suite 700
Newport Beach, CA 92660

/s/ Andrea Roberts Pierson
